

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

<b>UNITED STATES OF AMERICA</b>	)	<b>CASE NO. 1:11 CR 00070</b>
	)	
<b>Plaintiff</b>	)	<b>JUDGE DAVID D. DOWD, JR.</b>
	)	
<b>v.</b>	)	<b>DEFENDANT, MATTHEW HOLLAND’S</b>
	)	<b>MOTION FOR PREPARATION OF A</b>
<b>MATTHEW HOLLAND</b>	)	<b>PRESENTENCE REPORT</b>
	)	<b>PRIOR TO A PLEA OR</b>
<b>Defendant</b>	)	<b>FINDING OF GUILT</b>

Now comes Defendant, Matthew Holland, by and through counsel, and respectfully moves this Honorable Court for an Order requiring the United States Probation Office to prepare a Presentence Report prior to any plea or finding of guilt in the instant case. The reason for this motion is that there are issues relating to Matthew Holland’s criminal history, which the requested report may assist in resolving. In that Matthew Holland is charged with a violation of Title 18, U.S.C. 2113(a), the criminal history concerns are especially significant due to his potential exposure to increased sentencing provision under 21 U.S.C. Section 841 (b)(1)(A). The ends of justice served by granting this motion, and the resulting continuance of the instant trial, outweigh the best interests of the public and Mr. Holland in a speedy trial. See 18 U.S.C. Section 3161(h)(8)(A).

Defense counsel has discussed this matter with Assistant United States Attorney Phillip J. Tripi, who indicated he has no objection to this motion.

For the foregoing reason, Matthew Holland respectfully requests that the Court grant this motion.

Respectfully submitted,

s/John P. Hildebrand, Sr.  
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies a copy of the foregoing Defendant, Matthew Holland's Motion for Preparation of a Presentence Report Prior to a Plea or Finding of Guilt has been filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system.

s/ John P. Hildebrand, Sr.  
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